

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a  
BRAZOS LICENSING AND  
DEVELOPMENT,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

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Case No. 6:20-cv-585-ADA

JURY TRIAL DEMANDED

**DECLARATION OF SACHLI BALAZADEH-NAYERI  
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT OF  
INVALIDITY OF U.S. PATENT NO. 8,737,961 BY DEFENDANT GOOGLE LLC**

I, Sachli Balazadeh-Nayeri, hereby declare under 28 U.S.C. § 1746:

1. I am an attorney licensed to practice in the State of California and am an attorney at the law firm of Warren Lex LLP, counsel for Google LLC. I am over the age of 18, have personal knowledge of the matters set forth in this declaration and, if called as a witness, I could and would testify competently to each of them.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the Opening Expert Report of Gregory Welch, Ph.D., dated March 29, 2023, which is annotated with highlighting in accordance with the Court's Standing Order Governing Proceedings 4.3 § X.11. Exhibit 1 contains information designated "RESTRICTED – ATTORNEYS' EYES ONLY" under the Court's Protective Order (Docket No. 54); Google accordingly files it under seal.

3. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No. 8,737,961 to Ma et al. bearing bates numbers WSOU\_585\_8737961-0000308 to WSOU\_585\_8737961-0000352.

4. Attached hereto as Exhibit 3 is a true and correct copy of Office Action Summary Non-Final Rejection, dated January 30, 2013 bearing bates numbers WSOU\_585\_8737961-0000117 to WSOU\_585\_8737961-0000123.

5. Attached hereto as Exhibit 4 is a true and correct copy of Office Action Summary Final Rejection, dated August 9, 2013, bearing bates numbers WSOU\_585\_8737961-0000086 to WSOU\_585\_8737961-0000098.

6. Attached hereto as Exhibit 5 is a true and correct copy of Applicant Arguments/Remarks Made in an Amendment, dated November 12, 2013, bearing bates numbers WSOU\_585\_8737961-0000049 to WSOU\_585\_8737961-0000058.

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the Deposition Transcript of Dr. Todor Cooklev, dated May 12, 2023, annotated with highlighting in accordance with the Court's Standing Order Governing Proceedings 4.3 § X.11.

8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the Expert Report of Dr. Tamás Budavári Regarding Infringement of U.S. Patent No. 8,737,961 by Google LLC, dated March 29, 2023. Exhibit 7 contains information designated "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY" and "RESTRICTED - CONFIDENTIAL SOURCE CODE" under the Court's Protective Order (Docket No. 54); Google accordingly files it under seal.

9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the Deposition Transcript of Dr. Tamás Budavári, dated May 25, 2023, annotated with highlighting in

accordance with the Court's Standing Order Governing Proceedings 4.3 § X.11. Exhibit 8 contains information designated "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY" under the Court's Protective Order (Docket No. 54); Google accordingly files it under seal.

10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the Rebuttal Expert Report of Todor Cooklev on Validity Regarding U.S. Patent No. 8,737,961, dated April 28, 2023, annotated with highlighting in accordance with the Court's Standing Order Governing Proceedings 4.3 § X.11.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 28, 2023 in San Francisco, California.

  
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Sachli Balazadeh-Nayeri